

**From:** Angie Walls <angie.walls@ccapnw.org>  
**Sent:** Wednesday, September 04, 2013 5:00 PM  
**To:** SEPADesk2 (DFW)  
**Subject:** Comments on Cathlamet Channel Rearing Net Pens SEPA DNS  
**Attachments:** Cathlamet Channel Test Fish Summary 2013.pdf



**Coastal Conservation Association**

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September 4, 2013

Mr. Bob Zeigler  
SEPA/NEPA Coordinator  
WDFW Regulatory Services Section  
600 Capitol Way North  
Olympia, WA 98501-1091

Mr. Zeigler:

Please accept these comments on the proposed Determination of Nonsignificance (DNS) for the Washington Department of Fish and Wildlife (WDFW) Cathlamet Channel Salmon Rearing Net Pens issued on August 19, 2013.

Coastal Conservation Association (CCA) Washington is the state chapter of the national 501(c)(3) organization with more than 206 local chapters throughout 17 states with a current combined membership of nearly 100,000. The purpose of CCA is to advise and educate the public on conservation of marine resources. The objective of CCA is to conserve, promote, and enhance the present and future availability of those coastal resources for the benefit and enjoyment of the general public.

We have reviewed the proposed DNS and the associated environmental checklist and do not believe they accurately describe potential adverse impacts of the Cathlamet Channel Salmon Rearing Net Pens and resulting commercial gillnet fisheries in the Cathlamet Channel. As such, we believe a full Environmental Impact Statement is appropriate to more fully outline the likely impacts of the net pens and resulting commercial gillnet fisheries and provide the public more specific detail on responses provided in the environmental checklist that lack substantiation.

There are a number of shortcomings with the DNS and responses to the environmental checklist. The first involves a lack of specificity and disclosure of information relied upon to determine that commercial gillnet fisheries can take place in Cathlamet Channel without having a significant impact on upriver salmon and steelhead migrating through the area. WDFW's response to checklist question # 8 is most illustrative here. In its response, the Department

provides vague references to test fishing data from the spring of 2013 that reportedly shows low interception of non-target and ESA-listed salmonids, but does not provide more specific information.

CCA recently received initial test fishing data from WDFW (see attached document dated August 15, 2013) that shows a high percentage of non-target upriver Chinook and steelhead that were caught in these test fisheries. In fact, as the attached data shows, 51% percent of the adult Chinook that were caught were of upriver origin, while only 49% were of lower river origin. Nearly 20 percent of these adult Chinook were unmarked, wild fish (and likely ESA-listed). It is difficult to understand how WDFW so easily concludes question #8 with “Cathlamet Channel is not a main migratory pathway for ESA-listed spring Chinook and that it is a promising location for locating net pens” when the data it recently made available to the public doesn’t appear to support this conclusion.

In a related issue, in response to question #5c WDFW asserts that “Based on test fishing results in Cathlamet Channel the interaction with migrating salmonids is expected to be much lower than in the mainstem Columbia River.” However, WDFW has provided no baseline harvest impact data for the “mainstem” or compared that with the test fishing results for Cathlamet Channel. It provides the public with no detailed information to determine the magnitude of supposed reductions in harvest impacts between the two and simply concludes that it “is expected to be much lower.” This is insufficient.

The DNS and environmental checklist also make little mention of likely impacts from the nets pens and gillnet fisheries to Columbia River basin steelhead, which are listed under the federal Endangered Species Act and as a gamefish are not legal for commercial harvest. The preliminary test fishing data provided by WDFW showed a 20 percent bycatch rate of steelhead in Cathlamet Channel test fisheries. This means for every 10 Chinook harvested, 2 Steelhead were caught, of which 1.1 were unmarked, wild steelhead. There is no mention in the DNS or environmental checklist outlining this data or explaining possible impacts to steelhead, which is a recreational species and for which increased commercial bycatch could harm ESA recovery efforts or limit recreational opportunity.

WDFW’s apparent determination that the Cathlamet Channel net pens and resulting commercial gillnet fisheries will have no significant impacts on non-target and upriver fish populations also appears to ignore the findings of past studies and statements from commercial fishing representatives. In fact, in April of 2008 Salmon for All, an industry group representing commercial gillnet fishers, issued a white paper entitled “An Overview of the Select Area Fishery Enhancement Project.” This document can be found at: <http://www.salmonforall.org/wp-content/uploads/2010/05/SAFE-Overview-a-Salmon-For-All-white-paper.pdf> In its description of Cathlamet Channel, Salmon for All noted that “Cathlamet Channel also is an important migratory route for listed upriver stocks”, which is directly in conflict with WDFW’s finding that “Cathlamet Channel is not a main migratory pathway for the ESA-listed spring Chinook.” Many of these same issues were raised in the April 1995 “*Lower Columbia River Terminal Fisheries Research Project Final Environmental Assessment*” funded by the Bonneville Power Administration (BPA).

The DNS and environmental checklist also fail to disclose the likely adverse impact the net pens and resulting commercial gillnet fisheries will have on existing recreational fisheries in the Cathlamet Channel. Question # 12 requires WDFW to outline impacts to recreation, but no effort was made to disclose how the commercial gillnet fisheries that will result from the net pens will lead to restrictions on recreational fisheries in the area. On the other hand, Salmon for

All in its April 2008 White Paper noted that Cathlamet Channel and the other alternatives sites studied but not adopted in the BPA-funded study comprised “well-known and popular sportfishing locales.”

The DNS and environmental checklist also fail to consider what impacts returning hatchery fish from the net pen smolt production could have on local wild fish stocks if excess hatchery fish are unable to be harvested. This could occur either because planned commercial gillnet harvests are not approved due to their impacts on wild upriver stocks or an inability to harvest the fish returning to the new net pens in commercial fisheries. The “straying” of returning hatchery fish from SAFE areas to natural spawning areas is well documented in other areas and more consideration should be given to possible straying into rivers and streams neighboring Cathlamet.

The environmental checklist and DNS inaccurately describe the Cathlamet Channel as an “off-channel” area. Unlike Youngs Bay in Oregon, or Deep River in Washington, Cathlamet Channel is not an “off-channel” area. StreamNet is administered by the Pacific States Marine Fisheries Commission and counts a number of federal and state agencies, included WDFW, as participating agencies. StreamNet exists in part to standardize data across these multiple agencies. In a glossary of terms available on its website (<http://www.streamnet.org/glossarystream.html>) StreamNet provides the following relevant definition:

Off-channel area -- Any relatively calm portion of a stream outside of the main flow.

Cathlamet Channel clearly does not meet this definition and should more accurately be described as a “side channel” or “secondary channel” to provide the public with a more accurate description of what is being proposed and the potential impacts on the natural environment and migrating fish populations.

In summary, we believe that the DNS and environmental checklist do not provide an adequate consideration of the likely significant adverse impacts of this project. As such, we believe WDFW should issue a full Environmental Impact Statement that better outlines possible adverse impacts and discloses the data and documentation for conclusions that are reached.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nello Picinich". The signature is fluid and cursive, with the first name "Nello" and last name "Picinich" clearly distinguishable.

Nello Picinich  
Executive Director  
CCA Washington